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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PLATINUM MANAGEMENT GROUP
8, LLC, A NEVADA LIMITED
LIABILITY COMPANY D/B/A
Z-MART 2, and RODY YOUSIF, an
Individual,

Plaintiffs,

vs.

UNITED STATES OF AMERICA,

Defendant.

Case No. 2:24-cv-1798-JCM-BNW

**Stipulated Discovery Plan and Scheduling
Order**

Submitted in Compliance with LR 26-1(b)

Under Federal Rule of Civil Procedure 26(f) and Local Rule 26-1, Plaintiffs Platinum Management Group 8, LLC dba Z-Mart 2 and Rody Yousif and Federal Defendant United States of America (“Federal Defendant”) submit their stipulated discovery plan and scheduling order.

Plaintiffs filed their Complaint on September 24, 2024, ECF No 1. On December 30, 2024, the Federal Defendant filed its Answer to Plaintiffs’ Complaint, ECF No 9. In accordance with LR 26-1(b)(1), the discovery cut-off date will be 180 days from the date of Defendant’s Answer. 180 days from December 30, 2024, is June 30, 2025.

Under LR 26-1(b)(1) provides that “[u]nless the court orders otherwise, discovery periods longer than 180 days from the date the first defendant answers or appears will

1 require special scheduling review.” Here, as noted above, on December 30, 2024,
2 Defendant filed its Answer to the Complaint. This was the first answer filed and/or first
3 appearance by a defendant in the case. Instead of utilizing December 30, 2024, as the start
4 date for the 180 days for the discovery period, Plaintiffs and Defendant hereby request that
5 the start date be Monday, February 24th, 2025, as the Defendant is presently undergoing
6 an administration change, and the parties expect delays in discovery. Accordingly, and as
7 requested, the parties are submitting utilizing Monday, February 24th, 2025, as the start
8 date for the 180 days of discovery which will provide all parties with a full discovery
9 period. Upon information and belief, the Plaintiffs note that many of the Defendant’s
10 personnel, officers, and 30(b)(6) witnesses are not located within the Nevada area, and may
11 be in Washington, D.C., New York and Virginia. These distances may impact the
12 discovery.

13 The parties met and conferred on January 30, 2025, to discuss matters in
14 compliance with LR 26-1. Based upon counsels’ review of the evidence in this case, the
15 parties now propose the following discovery plan:

16 Deadlines that fall on Saturdays, Sundays, or legal holidays have been adjusted to
17 the next day that is not a Saturday, Sunday, or legal holiday per Federal Rule of Civil
18 Procedure 6(a)(1)(C).

19 1. Initial Disclosures. The parties will serve initial disclosures by **February 13,**
20 **2025.**

21 2. Close of Discovery. The parties agreed to the 180-day discovery timeline as
22 set forth in Local Rule 26-1(b)(1). Therefore, all discovery must be completed no later than
23 **August 25, 2025.**

24 3. Amending the Pleadings and Adding Parties. The deadline for filing motions
25 to amend the pleadings or to add parties is **May 27, 2025**, which is 90 days before the close
26 of discovery.

1 4. Expert Disclosures. Disclosures of experts shall be made 60 days before
2 discovery cut-off date, or by **June 26, 2025**. Disclosure of rebuttal experts shall be made 30
3 days after the initial disclosures of experts, or by **July 28, 2025**.

4 5. Dispositive Motions. Dispositive motions must be filed by **September 24,**
5 **2025**, which is 30 days after the close of discovery.

6 6. Pretrial Order. The parties' joint pretrial order is due **October 24, 2025**,
7 which is 30 days after the dispositive-motion deadline. If dispositive motions are filed, the
8 deadline for filing the joint pretrial order will be suspended until 30 days after decision on
9 the dispositive motions or further court order.

10 7. Rule 26(a)(3) Disclosures. The disclosures required by Federal Rule Civil
11 Procedure 26(a)(3) and any objections to them will be included in the parties' joint pretrial
12 order.

13 8. Alternative Dispute Resolution. The parties have considered resolution and
14 the possibility of using alternative dispute-resolution processes, and the parties may revisit
15 these options as the case proceeds.

16 9. Alternative Forms of Case Disposition. The parties have considered trial by a
17 magistrate judge and the short trial program, and the parties may revisit these options as
18 the case proceeds.

19 10. Electronic Evidence. The parties anticipate their initial, supplemental, and
20 responsive production of materials will be in .pdf and/or paper formats. These productions
21 may be served by electronic means. Plaintiff understands the Federal Defendants' productions
22 of electronic files including .pdfs must typically be made via encrypted means, e.g., an
23 encrypted disc, with password provided separately, or use of the United States' cloud-based
24 file exchange portal, "USAfx." Should any technical difficulties arise with these encrypted
25 means, counsel will make good faith efforts to meet, confer, and resolve the difficulties.

Respectfully submitted this 13th day of February 2025.

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/s/ John C. Courtney

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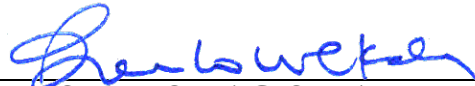
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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: February 18, 2025